

FILED
10/7/2022

SMB

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT

for the
NORTHERN
DISTRICT OF ILLINOIS
EASTERN DIVISION

BRANDON SMETANA
SKYCOIN GLOBAL FOUNDATION LIMITED,
SYMBOLIC ANALYTICS INC.

Plaintiff(s)

-v-

BRADFORD STEPHENS, AARON
KUNSTMAN, HARRISON GEVIRTZ, f/k/a
“HaRRo”, RYAN EAGLE, ANDREW YOUNG, FAR
AHEAD MARKETING, JOEL WAYNE
CUTHRIELL f/k/a “JOEL”, MORGAN PECK, et al.

Defendant(s)

Case No. 1:22-cv-00708

Jury Trial: No

THE DEFENDANT’S ANSWER TO THE COMPLAINT

I. The Parties Filing This Answer to the Complaint

Name	<u>Joel Cuthriell</u>
Street Address	<u>8922 E 49th Pl</u>
City and County	<u>Tulsa, Tulsa</u>
State and Zip Code	<u>Oklahoma, 74145</u>
Telephone Number	<u>4055820062</u>
E-mail Address	<u>joel@cuthriell.com</u>

II. The Answer and Defenses to the Complaint

Defendant denies the allegations by Plaintiff in 108 through 110

108. The Defendant was not hired to harass Skycoin or otherwise interfere, made no mention of paying journalists, did not pay journalists, and did not discuss false reporting strategies.

109. The Defendant did not orchestrate complaints.

110. The Defendant did not post messages with the phrases “Nice work team” and “PARTY TIME.”

Defendant denies the allegations by Plaintiff in 111 through 136

The Defendant has not participated in coordinated actions against the Plaintiffs properties, nor has the Defendant participated in an “enterprise” to conduct a multi-year campaign to harass the Plaintiff.

Defendant denies the allegations by Plaintiff in 174 through 188

175. The Defendant did not have any involvement with Skycoin until July 2018.

176. The Defendant has not threatened or harassed the Plaintiff. Nor has he gamed the Plaintiff’s reward system by creating multiple accounts.

179. The Defendant has not developed malicious software to defraud the Plaintiff.

Defendant denies the allegations by Plaintiff in 189 through 194

The Defendant has not coordinated with other defendants to interfere with the Plaintiff’s operations.

Defendant denies the allegations by Plaintiff in 195 through 205

The Defendant has not acted in concert with other defendants to enact “delistings.”

Defendant denies the allegations by Plaintiff in 209 through 212

209. The Defendant isn’t aware of *www.skycoin.net* ever being stolen. Nor was there a scheme to extort based off control of the domain.

211. The Defendant never received stolen intellectual property.

212. The Defendant did not scheme to transform Skycoin in to a new company.

Defendant denies the allegations by Plaintiff in 221 through 229

The Defendant has not stolen, received, or distributed trade secrets, code, or secret company property.

Defendant denies the allegations by Plaintiff in 231 through 237

The Defendant did provide benefit to the Plaintiff’s approval, as was reviewed and paid on a month-by-month basis.

Defendant denies the allegations by Plaintiff in 270 through 276

No written terms were agreed to or signed, nor was performance disproved of during the Defendant’s tenure.

Defendant denies the allegations by Plaintiff in 277 through 284

The Defendant did not have any involvement with Skycoin until July 2018.

The Defendant did provide benefit to the Plaintiff’s approval, as was reviewed and paid on a month-by-month basis.

No written terms were agreed to or signed, nor was performance disproved of during the Defendant’s tenure.

III. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: October 7, 2022

Signature of Defendant 

Printed Name of Defendant Joel Cuthriell